

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR 22-40025

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

KEENAN CHIDAUSHE,

Defendant.

The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3):

My name is Keenan Chidaushe.

In November 2021, I was 24 years-old and lived in Brookings, South Dakota.

On November 14, 2021, I used my cell phone to record a video of “Female Juvenile A” engaging in oral-genital contact, which is sexually explicit conduct as defined in 18 U.S.C. § 2256(2)(A). At that time, I knew that “Female Juvenile A” was a minor, that is, under that age of 18 years old.

My cell phone, an iPhone 12, had previously been shipped and transported in interstate commerce.

All of my actions were in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

For forfeiture purposes, I further stipulate and agree that the following property was used or intended to be used in the commission of the offense described above:

iPhone 12, black in color, with serial number G6TDG7JW0DXP.

ALISON J. RAMSDELL
United States Attorney



04/21/2023

Date

Jeffrey C. Clapper
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4-11-23

Date



Keenan Chidaushe
Defendant

4-11-2023

Date



Matthew M. Powers
Attorney for Defendant